



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D.C., 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

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MEMORANDUM

May 17, 2010

SUBJECT: **Glufosinate-ammonium:** Transmittal of Data Evaluation Records for Environmental Fate Studies.

TO: Jose Gayoso, Chemical Review Manager
Tom Myers, Team Leader
RMIB II / PRD (7508P)

FROM: Greg Orrick, Environmental Scientist
ERB IV / EFED (7507P)

Greg Orrick 5-17-10

APPROVED BY: Mark Corbin, Acting Chief
ERB IV / EFED (7507P)

MC 5-17-10

This memo is to inform you that three (3) DERs (all of which include an addendum) and one (1) DER addenda for an existing DER for environmental chemistry methods (ECM) of glufosinate-ammonium are finalized. The ECM MRIDs and new or updated classifications are listed in **Tables 1 and 2** below.

Table 1. DERs and Classifications for Environmental Chemistry Methods for Glufosinate-ammonium.

MRID	Study Type (OPPTS Guideline)	DER Electronic File Name(s)	Study Classification
41323123	Environmental Chemistry Method: Soil (835.6100)	128850 41323123 ECM-soil.pdf	Upgradeable
41920106	Environmental Chemistry Method: Soil (835.6100)	128850 41920106 ECM-soil.pdf	Upgradeable
43766915	Environmental Chemistry Method: Soil (835.6100)	128850 43766915 ECM-soil.pdf	Upgradeable

Table 2. Addendum, Updated Classification, and SAN Document Number for a Current Environmental Chemistry Method DER for Glufosinate-ammonium.

MRID	Study Type (OPPTS Guideline)	DER Electronic File Name(s)	SAN Document	Study Classification
40345666	Environmental Chemistry Method: Soil/Water/Plants (835.6100, 835.6200+)	128850 40345666 ECM Addendum.doc	2035501	Upgradeable

The following ECM for glufosinate-ammonium was not reviewed because it was not independently validated. If it is independently validated, it will be reviewed and its classification may be upgraded.

Table 3. Unreviewed Environmental Chemistry Method for Glufosinate-ammonium.

MRID	Study Type (OPPTS Guideline)	DER Electronic File Name(s)	Study Classification
47542606 47542607	Environmental Chemistry Method: Soil/Water (835.6100, 835.6200)	(no DER: no independent laboratory validation submitted)	Upgradeable

Addendum No. 1 to MRID 40345666

DER Study Title: Method Verification of the Analytical Method for the Analysis of HOE 039866 and HOE 061517 in Crops and Soil and Validation of the Analytical Method AL 38/85 for the Residue Analysis of HOE 039866 in Plant Materials, Water and Soil.

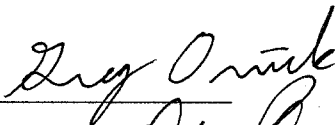
Guideline Number: 835.6100, 835.6200

Reasons for changes:

- Downgrade of status from Acceptable to Unacceptable but upgradeable.
 - This report includes a description of an analytical method for residues in plant materials, water, and soil as well as an apparently independent laboratory validation of the method. Independent validations of analytical methods must be submitted separately from the original analytical method reports and comply with OCSPP guideline 850.7100.
 - An explanation was not provided of how the limits of detection were calculated. Limits of quantitation were not reported.
 - Fortification levels were not provided for the analytical method in water.
 - Validation results were inadequately presented and discussed. For example, the relationship between Tables 5.1.3.2 and 5.1.3.2.1 is unclear.

The analytical methods in soil and water and their validations may be upgraded if they are submitted in a clear, OCSPP guideline-compliant format that includes the guideline-recommended data, including fortification levels, quantitation limits, validation results, and the information necessary to ascertain the independence of the laboratory conducting validation.

Revised by : Greg Orrick



Date: 5-5-10

Secondarily reviewed by: Chuck Peck



Date: 5-14-10